

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

JANET WILAMOWSKI
Debtor

: Case No. 23-12723
: Chapter 13
: Judge Patricia M. Mayer

PNC Bank, National Assn.
Movant

: Date & Time of Hearing
: Place of Hearing
: March 27, 2024 at 01:00 p.m.

vs.

:

Janet Wilamowski
Kenneth E. West
Respondents

: U.S. Bankruptcy Court,
: 900 Market Street, Courtroom #1,
: Philadelphia, PA 19107

**DEBTOR'S ANSWER TO MOTION FOR STAY RELIEF FILED BY
PNC BANK, N.A. REGARDING FIRST MORTGAGE PAYMENT DEFAULT**

Janet Wilamowski, Debtor, through her Attorneys, Allen B. Dubroff, Esq. and Associates Answers the above-captioned Stay Relief Motion filed by PNC Bank, N.A. as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. If relevant, strict proof is demanded at the time of Hearing.
6. Denied for the reasons set forth herein this Answer are incorporated by reference.
7. Denied. PNC's records should reflect that Debtor is current with regard to all post-petition payments on the mortgage obligation with the exception of the March 2024 payment which shall be made prior to the March 27th, 2024 Hearing date. The last four digits of the mortgage referred to are 9474.
8. Admitted.

9. Denied for the reasons set forth in answers to paragraphs 1-8 which are incorporated herein by reference.

WHEREFORE, Debtor prays that the relief requested be Denied.

Respectfully Submitted,

By: 

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